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Department and Sheriff Joseph Lombardo  
8 Lt. Michael Lusch

9 UNITED STATE DISTRICT COURT  
10 DISTRICT OF NEVADA, SOUTHERN DIVISION

11 \*\*\*

12 GUSTAVO RAMOS,  
13 Plaintiff,  
14 vs.

CASE NO. 2:19-cv-0124-RFB-VCF

**STIPULATION AND ORDER TO  
EXTEND THE DEADLINE TO FILE  
DISPOSITIVE MOTIONS**

**FIRST REQUEST**

15 CLARK COUNTY DETENTION CENTER,  
(an operating agency of Clark County NV),  
16 NAPHCARE, INC. (a foreign corporation),  
UNKNOWN MEDICAL SERVICES  
17 PROVIDER (CORP ROE #1), WARDEN OF  
CCDC (JOHN DOE #1), in his individual and  
18 professional capacity, SHERIFF JOSEPH  
LOMBARDO, LAS VEGAS  
19 METROPOLITAN POLICE DEPARTMENT,  
in his individual and professional capacity,  
20 YOLANDA KING, in her individual and  
professional capacity, (Clark County  
21 Manager), JEFF WELLS, in his individual and  
professional capacity (Asst. Clark County  
22 Manager), LT. MICHAEL LUSCH, (Lusch or  
Lt. Lusch) in his individual and professional  
23 capacity as a supervisor at CCDC, DOES 1-X,  
ROES 1-X, et al.

24 Defendants.  
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This Request for an extension of time is not sought for any improper purpose or other purpose of delay. This request for extension is based upon the following:

WHEREFORE, the parties respectfully request that this Court extend the time for the parties to file their dispositive motions by sixty-two (62) days from the current deadline of July 13, 2021 up to and including September 13, 2021.

Dated this 22<sup>nd</sup> day of June, 2021.

THE MARKOWITZ LAW FIRM

*/s/ Warren Ross Markowitz*  
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*Gustavo Ramos*

...

1 Dated this 22<sup>nd</sup> day of June, 2021.

2 OLSON, CANNON, GORMLEY & STOBERSKI

3 */s/ Stephanie A. Barker*  
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8 *Attorneys for Defendants*  
9 *Yolanda King and Jeff Wells*

Dated this 22<sup>nd</sup> day of June, 2021.

SCHUERING ZIMMERMAN & DOYLE, LLP

*/s/ Chad C. Couchot*  
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Attorneys for Defendant  
NAPHCARE, INC.

13 **ORDER**

14 IT IS SO ORDERED.

15 Dated this 23<sup>rd</sup> day of June, 2021.

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18 UNITED STATES MAGISTRATE JUDGE

19 The Joint Pretrial Order must be filed on or before October 13, 2021.

20 If dispositive motions are filed, the deadline  
21 for filing the joint pretrial order will be suspended until 30 days after  
22 decision on the dispositive motions or further court order.